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Although I own a Massachusetts based biomass energy business, and have been in the wood fired boiler business for 20 years, I have not participated in the Portfolio Standard review process because it does not directly pertain to my market. However, my BTU (not Kwh) based biomass energy market will be impacted by the tone the Standard's message sends to the public regarding the need for technology to "clean up" wood emissions.

My Company, Biomass Combustion Systems, designs, sells, manufactures, permits, installs and starts up industrial wood fired boilers and furnaces less than 30 mmbtu/hr (up to three tractor trailer loads of green chips/dust a day). Our marketing targets industries that have wood residue or who can buy in wood residue as fuel. 95% of our market is west of New England. The last boiler I sold in Massachusetts was to Athol Table in Athol, Mass in 1992(?) and they bought a boiler half the size of their need because of the State's air quality standards. The Massachusetts law requiring .1 b/mmbtu particulate standards on boilers less than 30 mmbtu/hr has literally regulated my Company out of the boiler business in the State. Simply put, the standard fails to consider the economic consequence of this requirement on smaller systems.

The new Portfolio Standard clearly demonstrates the State's interest in using technology to leverage lower emissions from efficient combustion. The Net Heat Rate standards for Advanced Biomass Power conversion makes a lot of sense for electric generating facilities, but does nothing for BTU production. In our moderate scale market, BTUs have the value and generating electricity only lengthens the payback. Other States where I work recognize the value of minimizing wood residue transportation costs with smaller systems which cost effectively produce only BTUs, not KWh. In Massachusetts, the focus is on large scale, centralized systems where economies of scale can cost justify high technology emission controls which produce remarkable results. The true cost of this philosophy is smaller scale systems (like the Mt. Wachusetts Community College installation) need government subsidies to be developed.

The true irony of the State's biomass energy policy is pollution from residual wood stoves runs rampant. Outside residential hot water wood boilers – otherwise known as smoke-a-matics – reinforce the misconception that wood is a dirty, polluting fuel. Our industrial boilers do not smoke or create nuisances in other states. From my perspective, the State of Massachusetts needs some equitable middle ground between the large scale systems described in the latest Portfolio Standards and these polluting residential systems.

The new Portfolio Standard go a long way towards clarifying what was a very confusing standard. I was so pleased to see that the focus has shifted towards what comes out of the stack rather than the design of the system. Over the years I have learned how quickly issues get polarized in the public sector. Once positions are set, it is extremely difficult to re-evaluate opportunities in an objective way. Individuals in both the public and private sectors are often too busy to revisit issues. I am therefore concerned about the proposed blurring of the distinction between Construction and Demolition material and wood residue.

In large scale plants, technology can be used to minimize the emissions from these C&D plants. In my smaller scale market, we see wood as a clean, renewable and greenhouse gas neutral fuel which can be used to build and strengthen communities around a renewable fuel which stabilizes and reduces local industries energy costs. The purity of this fuel, and the societal benefits it brings, in my mind should enable the fuel to be encouraged with the best, cost effective, emission control possible. Blurring the distinction between clean biomass plants and C&D plants will encourage public misconceptions that high priced technologies are required to protect public health in all biomass plants.

Our industry's public image is already mired in too many public misconceptions. There needs to be trade offs if the world is not going to be dependent on standards developed using natural gas as the benchmark. Wood does not contain sulfur like oil and is green house gas neutral. There is a value to burning clean wood as efficiently as is cost effectively possible. Wood is a decentralized fuel source with many opportunities for smaller scale applications. Please try to maintain the distinction between pure wood and C&D while thinking about how to promote smaller scale wood energy plants in the State of Massachusetts.

I hope the above comments are helpful and wish I had more time to participant in Massachusetts policy formation.

Respectfully Submitted

Charles R. Cary